

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1-3 and 5-7 are pending. Claims 1 and 5, which are independent, are hereby amended. Claims 4 and 8 had been canceled without prejudice or disclaimer of subject matter. Support for the amendments is provided throughout the Specification, especially at page 10.

No new matter has been introduced. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

### **II. REJECTIONS UNDER 35 U.S.C. §112**

Claims 1-3 and 5-7 were rejected under 35 U.S.C. §112, second paragraph.

Claims 1, 3, 5, and 7 have been amended, thereby obviating the §112 issues.

### **III. REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 1-3 and 5-7 were rejected under 35 U.S.C. 103(a) as allegedly unpatentable over U.S. Patent No. 6,757,694 to Goodman et al. (hereinafter, merely "Goodman") in view of U.S. Publication No. 2002/0161852 to Allen et al. (hereinafter, merely "Allen") and in further view of U.S. Patent No. 6,880,101 to Golasky et al. (hereinafter, merely "Golasky").

#### IV. RESPONSE TO REJECTIONS

Claim 1 recites, *inter alia*:

“A tape library apparatus to which a node ID is assigned and that is connected to a host computer, comprising:

**..wherein the first addresses and the second addresses are stored in a nonvolatile memory disposed in corresponding drives...**” (emphasis added)

As understood by Applicant, Goodman relates to network devices in a storage system implementing unique names for enabling communication with the devices via uniquely identifying and assigning names to devices connected in networks. Assignment of names to existing library storage products provisioned requires allocation of unique names according to the serial numbers of each existing automated library storage product.

As understood by Applicant, Allen relates to a method and system for using a Fibre Channel for tracking remote devices with unknown configurations used by Fibre Channel connected devices. Communication with a remote device takes place if the identified device identifier matches the previously stored device identifier.

As understood by Applicant, Golasky relates to a system and method for providing automatic data restoration after a storage device failure. An agent maps spare logical units to an address associated with a host in response to detecting the failure at a logical unit.

Applicant submits that Goodman, Allen and Golasky, taken alone or in combination, fail to teach or suggest “wherein the first addresses and the second addresses are stored in a nonvolatile memory disposed in corresponding drives”, as recited in claim 1 (emphasis added).

Furthermore, claim 1 also recites,

“wherein an address previously assigned to a particular drive upon production is used when (i) the particular drive is not assigned the first address and the second address and (ii) a command causing the particular drive to be assigned the first address and the second address is not received from the host computer.” (emphasis added)

Applicant submits that the Office Action relies on Golasky, column 5, lines 28-33 as a basis of rejection for this claimed feature. However, Applicant submits that Golasky states that a host address may be a fibre channel world wide name (WWN), which is an identifier. Applicant respectfully submits that an eight byte unique identifier, as described in Golasky fails to teach or suggest that an address previously assigned to a particular drive upon production is used when (i) the particular drive is not assigned the first address and the second address and (ii) a command causing the particular drive to be assigned the first address and the second address is not received from the host computer. Specifically, Golasky fails to teach or suggest the previous assignment feature or the command feature as recited in claim 1.

Therefore, Applicant respectfully submits that claim 1 is patentable.

For reasons similar to those described above with regard to independent claim 1, claim 5 is also patentable.

## V. DEPENDENT CLAIMS

The other claims are dependent from independent claim 1 and 5, discussed above, and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

**CONCLUSION**

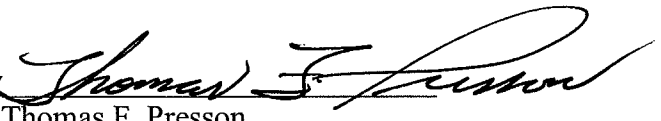
In the event the Examiner disagrees with any of the statements appearing above with respect to the disclosures in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate the portion, or portions, of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicant respectfully request early passage to issue of the present application.

Respectfully submitted,

FROMMER LAWRENCE & HAUG LLP  
Attorneys for Applicants

By   
Thomas F. Presson  
Reg. No. 41,442  
(212) 588-0800